

# Exhibit A

COMMONWEALTH OF MASSACHUSETTS

LAWRENCE SUPERIOR COURT

CIVIL ACTION NO.:

ELIZABETH S. MOON )  
Plaintiff )  
v. ) COMPLAINT AND JURY DEMAND  
INSTANT BRANDS LLC )  
f/k/a CORELLE BRANDS LLC )  
Defendant )  
\_\_\_\_\_  
)

1. Plaintiff Elizabeth S. Moon is an individual who resides in Boxford, Essex County, Massachusetts.
2. Defendant Instant Brands, LLC is a company with headquarters in Downers Grove, Illinois.
3. On July 13, 2019, at approximately 6:30 p.m., the Plaintiff was properly and normally holding the Defendant's product, a Pyrex glass baking dish, in her hands while at home in her kitchen.
4. At said time and place, the Defendant's product, the Pyrex glass baking dish, spontaneously broke apart into two main portions, and a third smaller portion, resulting in sharp edges of the broken glass coming in contact with, and lacerating, fingers on the Plaintiff's left hand, and severing the nerve in the left ring finger.
5. The Plaintiff has the following permanent related injuries: Numbness and experience of "pins and needles" pain in her left ring finger, enlargement of left ring finger, unusual pain in cold weather in left ring finger, lack of full motion in left ring finger, and gripping weakness in left hand.
6. The Defendant had a duty to manufacture a product that would not spontaneously break apart under normal handling and use, and a duty to warn users of this hazard by product labeling, by public notice, and/or by recall of the product.
7. Since the product was being used normally and the Plaintiff had a reasonable expectation that the product would remain intact and whole, as opposed to spontaneously breaking apart, the Plaintiff's seeks damages to be compensated for the permanent injuries, pain, and suffering directly related to the failure of the Defendant's product to meet normal expectations during normal handling and usage, and the failure of the Defendant to provide adequate warning.

WHEREFORE, Plaintiff Elizabeth S. Moon demands judgment against the Defendant in an amount to be determined by the Court together with interest and costs of this action.

PLAINTIFF DEMANDS A TRIAL BY JURY

Plaintiff, acting on her own behalf

  
Elizabeth S. Moon  
21A Lakeshore Rd  
Boxford MA 01921

7/12/2022  
Date